

Mr. Doug McKinzie
Avery Dennison - Fasson Roll Division
3011 Independence Drive
Fort Wayne, IN 46808

Re: 003-11988
First Administrative Amendment to
Part 70 003-7451-00196

Dear Mr. Doug McKinzie:

Avery Dennison - Fasson Roll Division was issued a permit on December 31, 1998 for a pressure sensitive paper coating and laminating operation. A letter requesting a modification to the existing FW-2 coater by increasing the speed of the machine from 850 feet per minute to 1200 feet per minute, was received on February 16, 2000. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (changes are bolded and stricken out for emphasis):

1. Condition A.2, Emission Units and Pollution Control Equipment Summary listed on page 5 of 36, is revised to reflect the increase in speed of the FW-2 coater and is as follows (changes are bolded and stricken out for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Two (2) pressure sensitive paper coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of 400 and ~~418~~ **598** billion square inches per year, FW1 exhausting to ten (10) stacks (A, C, D, E, F, G, M, BB, ZI-3 and ZE-1) and FW2 exhausting to nineteen (19) stacks (B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI-8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4), consisting of the following equipment:
 - (A) One (1) flow coating operation; and
 - (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;
- (2) One (1) natural gas fired Cleaver Brooks boiler, constructed in 1995, identified as B-3, with maximum heat input capacity of 10.2 million British thermal units per hour (mmBtu/hr); exhausting to one (1) stack (B-3).

2. Section D.1, Facility Description listed on page 26 of 36, is revised to reflect the increase in speed of the FW-2 coater and is as follows (changes are bolded and stricken out for emphasis):

- (1) Two (2) pressure sensitive paper coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of 400 and ~~418~~ **598** billion square inches per year, FW1 exhausting to ten (10) stacks (A, C, D, E, F, G, M, BB, ZI-3 and ZE-1) and FW2 exhausting to nineteen (19) stacks (B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4), consisting of the following equipment:
- (A) One (1) flow coating operation; and
- (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;

Insignificant Activities:

- (IA1) Four (4) cold cleaner degreasing operations;
- (IA2) Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons.
- (IA3) One (1) water based emulsion storage tank, with maximum storage capacity of 15,000 gallons;
- (IA4) Five (5) water based emulsion storage tanks, with maximum storage capacity of 15,954 gallons each;
- (IA5) One (1) water based emulsion storage tank, with maximum storage capacity of 12,000 gallons; and
- (IA6) Two (2) water based emulsion storage tanks, with maximum storage capacity of 13,152 gallons each.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

NLJ

cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector Jennifer Schick
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Avery Dennison - Fasson Roll Division
3011 Independence Drive
Fort Wayne, Indiana 46808**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-7451-00196	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 31, 1998
First Administrative Amendment: 003-11988	Pages Affected: 5 and 26
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary pressure sensitive paper coating and laminating operation.

Responsible Official: Doug McKinzie
Source Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
Mailing Address: 3011 Independence Drive, Fort Wayne, Indiana 46808
SIC Code: 2672
County Location: Allen
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Two (2) pressure sensitive paper coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of 400 and 598 billion square inches per year, FW1 exhausting to ten (10) stacks (A, C, D, E, F, G, M, BB, ZI-3 and ZE-1) and FW2 exhausting to nineteen (19) stacks (B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI-8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4), consisting of the following equipment:
 - (A) One (1) flow coating operation; and
 - (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;
- (2) One (1) natural gas fired Cleaver Brooks boiler, constructed in 1995, identified as B-3, with maximum heat input capacity of 10.2 million British thermal units per hour (mmBtu/hr); exhausting to one (1) stack (B-3).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Two (2) natural gas fired boilers, constructed in 1984 and 1986, identified as B-1 and B-2, each with maximum heat input capacity of 5.23 million British thermal units per hour (mmBtu/hr), each exhausting to one (1) stack (B-1 and B-2);

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) Two (2) pressure sensitive paper coating operations, constructed in 1984 and 1986, identified as FW1 and FW2, with a maximum capacity of 400 and 598 billion square inches per year, FW1 exhausting to ten (10) stacks (A, C, D, E, F, G, M, BB, ZI-3 and ZE-1) and FW2 exhausting to nineteen (19) stacks (B, J, K, L, O, P, ZI-1, ZI-2, ZI-3, ZI-4, ZI-5, ZI-6, ZI-7, ZI-8, ZI-9, ZI-10, ZE-2, ZE-3 and ZE-4), consisting of the following equipment:
- (A) One (1) flow coating operation; and
 - (B) Two (2) natural gas fired bake ovens, with total heat input capacity of 35.68 million British thermal units per hour;

Insignificant Activities:

- (IA1) Four (4) cold cleaner degreasing operations;
- (IA2) Three (3) water based emulsion storage tanks, with maximum storage capacity of 12,200, 12,700, and 12,200 gallons.
- (IA3) One (1) water based emulsion storage tank, with maximum storage capacity of 15,000 gallons;
- (IA4) Five (5) water based emulsion storage tanks, with maximum storage capacity of 15,954 gallons each;
- (IA5) One (1) water based emulsion storage tank, with maximum storage capacity of 12,000 gallons; and
- (IA6) Two (2) water based emulsion storage tanks, with maximum storage capacity of 13,152 gallons each.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of facility engaged in the surface coating of pressure sensitive paper may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating excluding water delivered to the coating applicator.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to this 40 CFR 60.442, Subpart RR, when the pressure sensitive paper coating operation input Volatile Organic Compound (VOC) usage exceeds 45 megagrams per 12 consecutive month period (equivalent to 49.6 tons per 12 consecutive month period), the pressure sensitive paper coating operation shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids (0.20 lb VOC per lb of coating solids) applied as calculated on a weighted average basis for one calendar month.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;